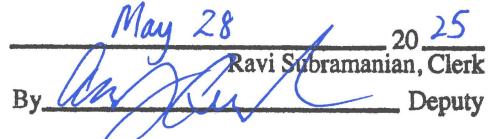


1 Presented to the Court by the foreman of the
2 Grand Jury in open Court, in the presence of
3 the Grand Jury and FILED in the U.S.
4 DISTRICT COURT at Seattle, Washington.

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7 
8 May 28 2025
9 By Ravi Subramanian, Clerk
10 Deputy

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12
13 UNITED STATES DISTRICT COURT FOR THE
14 WESTERN DISTRICT OF WASHINGTON
15 AT TACOMA

16
17 UNITED STATES OF AMERICA,
18 Plaintiff
19
20 v.
21 JOHNNY Q. NGUYEN,
22 Defendant.

23 NO. CR 25-5130 DGE
24 INDICTMENT

25
26 The Grand Jury charges that:

27 **COUNTS 1-5**

(Mail Fraud)

A. **Background**

1. JOHNNY Q. NGUYEN, a former United States Postal Service (USPS)
2 employee, stole at least \$90,851.00 from hundreds of Washington and California business
3 entities and charities. He would have stolen hundreds of thousands of dollars from
4 thousands of additional victims if his scheme to defraud Washington and California
5 businesses and charities had not been discovered prior to completion.

6. In the fall of 2024, NGUYEN sent, via the United States mail, mass
7 mailings on fake state government letterhead to thousands of entities. The mailings

1 contained fraudulent billing statements directing victims to send checks to USPS post
2 office (PO) boxes NGUYEN had rented, including in Olympia, Washington, ostensibly
3 for the purpose of paying business entity and charitable organization registration and
4 filing fees. The fraudulent billing statements further directed victims to make the checks
5 payable to “Business Entities,” which is the name of a California limited liability
6 company NGUYEN had formed months earlier.

7 3. Thousands of Washington and California victim businesses and charities
8 mailed checks, cashier’s checks, and money orders to NGUYEN’s PO boxes. NGUYEN
9 deposited approximately 350 monetary instruments from Washington victims, totaling
10 approximately \$82,210.00, and approximately 60 monetary instruments from California
11 victims, totaling approximately \$8,640.50, in bank accounts he controlled. The United
12 States seized approximately 1,711 pieces of mail containing additional monetary
13 instruments, totaling approximately \$395,295.00, before NGUYEN was able to retrieve
14 and deposit them.

15 ***B. The Scheme and Artifice to Defraud***

16 4. Beginning no later than July 24, 2024, and continuing through at least
17 December 23, 2024, in Thurston County within the Western District of Washington, and
18 elsewhere, JOHNNY Q. NGUYEN, with intent to defraud, knowingly devised a scheme
19 and artifice to defraud, and to obtain money and property by means of materially false
20 and fraudulent pretenses, representations and promises.

21 5. The essence of the scheme and artifice to defraud was to obtain money and
22 property by inducing victims in Washington and California to mail to PO boxes rented by
23 NGUYEN monetary instruments, including checks, cashier’s checks, and money orders,
24 made payable to “Business Entities,” ostensibly for the purpose of paying fees associated
25 with forming, registering, and renewing registrations of business entities and charities.

1 C. *The Manner and Means of the Scheme and Artifice*

2 6. It was part of the scheme and artifice to defraud that, on or about July 24,
3 2024, NGUYEN formed, and caused to be formed, Business Entities, LLC, a California
4 limited liability company.

5 7. It was further part of the scheme and artifice to defraud that NGUYEN
6 rented, and caused to be rented, PO boxes including, but not limited to, a PO box located
7 at the Olympia Main Post Office in Olympia, Washington (“Olympia PO Box”).

8 8. It was further part of the scheme and artifice to defraud that NGUYEN
9 created, and caused to be created, letters depicting a state government seal and letterhead
10 including, but not limited to, the Washington State Seal (“Scam Letters”). The Scam
11 Letters included the name of purported state government agencies including, but not
12 limited to, the “State of Washington Corporations [sic] & Charities Division.” The Scam
13 Letters identified recipient entities by name and entity number including, but not limited
14 to, the recipients’ Unified Business Identifier (UBI) numbers. The Scam Letters
15 contained instructions regarding annual registration fees for business entities and
16 charitable organizations and directed the recipients to make checks or money orders
17 payable to “Business Entities.” The Scam Letters directed recipients to send the monetary
18 instruments to PO Boxes rented and controlled by NGUYEN including, but not limited
19 to, the Olympia PO Box. A copy of a representative example of the Scam Letters is
20 included below:

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24 ///



State of Washington
Corporations & Charities Division
P.O. Box 5, Olympia, WA. 98507-0005

UBI TYPE: LLC
DUE DATE: 12-31-2024
UBI NUMBER: [REDACTED]
STATEMENT DATE: 12-13-2024

Service For

Billing Summary

Business Entity Default Fee.	\$180
Annual Report Filing Fee.	+\$50
State of Washington Tax.	\$0.00

Total Amount Due \$230
By 12-31-2024

Required State of Information

Statement Under Washington State law, all Limited Liability Companies (LLCs) are required to file formation documents with a \$180 default fee as per RCW 25.15. Additional fees apply depending on the services requested. For example, a \$50 fee applies for trademark amendments or other changes, regulated under RCW 19.77. Nonprofit corporations may qualify for a reduced filing fee of \$40 under RCW 24.03A if their gross revenue is under \$500,000.

Businesses must also submit an Annual Report under RCW 23.95.255, which includes the appointment of a registered agent under RCW 23.95.415. The registered agent is responsible for receiving legal documents on behalf of the business. Failure to file the Annual Report or update the Statement of Information can result in administrative dissolution, as specified in RCW 23.95.615. Businesses may also incur late fees or penalties if filings are not made in a timely manner.

Maintaining compliance with all filing requirements is crucial to ensure the business remains in good standing with the state.

Payment Instructions

Please make all checks or money orders payable to **Business Entities**.
Ensure your payment includes your UBI Number: [REDACTED] and mail it to the address provided in the next box.

State of Washington
Business Entities
PO Box [REDACTED]
Olympia, WA. 98507-0005

9. It was further part of the scheme and artifice to defraud that NGUYEN placed, and caused to be placed, the Scam Letters in an authorized USPS depository, to be sent to victims.

1 10. It was further part of the scheme and artifice to defraud that NGUYEN
 2 caused to be delivered by USPS to PO boxes rented and controlled by NGUYEN
 3 including, but not limited to, the Olympia PO Box, mailings enclosing monetary
 4 instruments made payable to “Business Entities” sent by victims.

5 11. It was further part of the scheme and artifice to defraud that NGUYEN
 6 retrieved, and caused to be retrieved, monetary instruments made payable to “Business
 7 Entities” sent by victims to PO boxes rented and controlled by NGUYEN including, but
 8 not limited to, the Olympia PO Box.

9 12. It was further part of the scheme and artifice to defraud that NGUYEN
 10 deposited monetary instruments, sent by victims, in bank accounts NGUYEN controlled
 11 including, but not limited to, Wells Fargo Bank, N.A. (“Wells Fargo”), account ending
 12 -4213 and Bank of America, N.A. (“Bank of America”), account ending -7464.

13 ***C. Execution of the Scheme and Artifice to Defraud***

14 13. On or about the dates identified below, within the Western District of
 15 Washington, and elsewhere, NGUYEN, for the purpose of executing and attempting to
 16 execute this scheme and artifice to defraud, knowingly caused to be delivered by USPS
 17 according to the direction thereon, the following mail matter, with each mailing
 18 constituting a separate Count of this Indictment:

COUNT	DATE	MAILING
1	December 13, 2024	Envelope containing a Scam Letter addressed to Intended Victim 1, located in Ridgefield, Washington
2	December 13, 2024	Envelope containing a Scam Letter addressed to Intended Victim 2, located in Fife, Washington
3	December 16, 2024	Envelope containing a check issued by Intended Victim 3 in the amount of \$230.00 made payable to “Business Entities” sent to Olympia, Washington
4	December 17, 2024	Envelope containing a check issued by Intended Victim 4 in the amount of \$230.00 made payable to “State of Washington Business Entities, PO Box [],”

		Olympia, WA 98507" sent to Olympia, Washington
5	December 18, 2024	Envelope containing a check issued by Intended Victim 5 in the amount of \$230.00 made payable to "Business Entities" sent to Olympia, Washington

All in violation of Title 18, United States Code, Sections 1341 and 2.

COUNTS 6-7

(Money Laundering – Concealment)

14. On or about the following dates, in the Western District of Washington, and elsewhere, JOHNNY Q. NGUYEN did knowingly conduct and attempt to conduct the following financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, mail fraud, in violation of Title 18, United States Code, Sections 1341 and 2, knowing that the transactions were designed in whole and in part to conceal and disguise, the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity:

COUNT	DATE	AMOUNT	TRANSACTION
6	December 17, 2024	\$5,000.00	Zelle payment from Wells Fargo account ending -4213, held in the name of Business Entities LLC, to JPMorgan Chase Bank, N.A. ("Chase") account ending -9832, held in the name of K.D. and V.N., with payment memo "HOLD THEM FOR ME"
7	December 17, 2024	\$5,000.00	Zelle payment from Wells Fargo account ending -4213, held in the name of Business Entities LLC, to Chase account ending -0152, held in the name of S.D. and V.N., with payment memo "HOLD THEM FOR ME"

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNTS 8–9

(Money Laundering – Promotion)

3 15. On or about the following dates, in the Western District of Washington, and
4 elsewhere, JOHNNY Q. NGUYEN did knowingly conduct and attempt to conduct the
5 following financial transactions affecting interstate and foreign commerce, which
6 involved the proceeds of a specified unlawful activity, that is, mail fraud, in violation of
7 Title 18, United States Code, Sections 1341 and 2, with the intent to promote the carrying
8 on of specified unlawful activity, that is, mail fraud, in violation of Title 18, United States
9 Code, Sections 1341 and 2, and that while conducting and attempting to conduct such
10 financial transactions knew that the property involved in the financial transactions
11 represented the proceeds of some form of unlawful activity:

COUNT	DATE	AMOUNT	TRANSACTION
8	December 9, 2024	\$3,730.23	Automated clearinghouse (ACH) payment from Wells Fargo account ending -4213, held in the name of Business Entities LLC, to USPS
9	December 13, 2024	\$11,427.27	ACH payment from Wells Fargo account ending -4213, held in the name of Business Entities LLC, to USPS

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

COUNTS 10-11

(Money Laundering – Spending)

21 16. On or about the following date, in the Western District of Washington, and
22 elsewhere, JOHNNY Q. NGUYEN did knowingly engage and attempt to engage in the
23 following monetary transactions, by through and to a financial institution, affecting
24 interstate and foreign commerce, in criminally derived property of a value greater than
25 \$10,000, such property having been derived from a specified unlawful activity, that is,
26 mail fraud, in violation of Title 18, United State Code, Sections 1341 and 2:

COUNT	DATE	AMOUNT	TRANSACTION
10	December 16, 2024	\$16,000.00	Wire transfer from Wells Fargo account ending -4213, held in the name of Business Entities LLC, to Chase account ending -3332, held in the name of V.N., with payment memo "Loan"
11	December 18, 2024	\$25,000.00	Withdrawal of United States currency from Wells Fargo account ending -4213, held in the name of Business Entities LLC

All in violation of Title 18, United States Code, Sections 1957 and 2.

FORFEITURE ALLEGATION

17. The allegations contained in Counts 1–11 above are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

18. Upon conviction of any of the offenses alleged in Counts 1–5, JOHNNY Q. NGUYEN shall forfeit to the United States any property constituting, or derived from, proceeds Defendant obtained directly or indirectly, as a result of the offense. All such property is forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), by way of Title 28, United States Code, Section 2461(c), and includes but is not limited to a sum of money, also known as a forfeiture money judgment, in the amount of \$90,851.00, reflecting the proceeds the Defendant obtained as result of the offense.

19. Upon conviction of any of the offenses alleged in Counts 6–11, JOHNNY Q. NGUYEN shall forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property. All such property is forfeitable pursuant to Title 18, United States Code, Section 982(a)(1).

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Substitute Assets. If any of the above-described forfeitable property, as a result of any act or omission of the defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States to seek the forfeiture of any other property of the defendant, up to the value of the above-described forfeitable property, pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL: *yes*

DATED: 28 May 2028

Signature of Foreperson redacted pursuant to the policy of the Judicial Conference of the United States.

FOREPERSON

TEAL LUTHY MILLER
Acting United States Attorney

THOMAS WOODS
Assistant United States Attorney

JEHIEL I. BAER
Assistant United States Attorney